



October 28, 2022

Benjamin W. Sonnenfeldt
(914.872.7460)
Benjamin.Sonnenfeldt@wilsonelser.com

Via Electronic Filing – PACER

Hon. Philip M. Halpern, U.S.D.J.
The Hon. Charles L. Brieant Jr.
Federal Building and Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *Doe v. County of Westchester, et al.*, 22-cv-06950 (PMH)

Dear Judge Halpern:

We represent the defendant White Plains Department of Public Safety (hereinafter, “White Plains”). We join in the County Defendants’ request to extend the time to respond to the complaint. Plaintiffs have not responded to our request for consent.

We are requesting this extension as we have just recently been retained to represent White Plains in this matter. At present, White Plains’ response to the complaint is due on November 7, 2022. In addition, there is a pending motion to proceed pseudonymously before this Court. Depending on the outcome, our firm may need to run an updated search for conflicts. White Plains is therefore requesting that our time to respond to the complaint be extended to either: (i) 20 days after a decision on the pseudonym motion if the motion is granted, or (ii) 20 days after Plaintiff files an amended caption if the motion is denied. White Plains has not made any previous requests for extensions of time to respond to the complaint in this case.



Hon. Philip M. Halpern, U.S.D.J.

Respectfully yours,

WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER, LLP
Attorneys for the City of White Plains
Department of Public Safety

A handwritten signature in black ink, appearing to read 'B. Sonnenfeldt', written over a horizontal line.

Benjamin W. Sonnenfeldt, Esq.
1133 Westchester Avenue
White Plains, New York 10604
(914) 323-7000

CC: All Parties Via ECF